

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

WILLIAM G. and JULIE A. HARSHAW,

Husband and Wife, Individually and as

Guardian of **ROMAN A. HARSHAW**, a
minor,

Case No. 1:08-cv-104

Residents and Citizens of the
Commonwealth of Virginia,

Hon. Paul Maloney
U.S. District Judge

Plaintiffs,

v.

**BETHANY CHRISTIAN SERVICES,
INC., and BETHANY CHRISTIAN
SERVICES OF HAMPTON ROADS,
INC., and BETHANY CHRISTIAN
SERVICES INTERNATIONAL, INC.,**

Defendants.

RYNBRANDT & ASSOCIATES

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VARNUM

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**MOTION TO AMEND THE CASE MANAGEMENT ORDER AND TO STRIKE
PLAINTIFFS' RECENTLY IDENTIFIED EXPERTS**

Oral Argument Requested

Defendants, Bethany Christian Services, Inc., Bethany Christian Services of Hampton Roads, Inc., and Bethany Christian Services International, Inc., by and through its attorneys, VARNUM, move for an Order: (1) to amend the Amended Case Management Order to extend Defendants' time to amend the Case Management Order (to produce expert reports), and (2) to strike Plaintiffs' recently identified experts or, in the alternative, to allow Defendants to name additional experts and to amend deadlines accordingly. In support of this Motion, Defendants rely upon the accompanying brief which is incorporated by reference.

Pursuant to W.D. Mich. L. Civ. R. 7.1(d), Defendants sought Plaintiffs' concurrence in this Motion. Plaintiffs have failed or refused to concur in the relief requested in this Motion.

VARNUM
Attorneys for Defendants

Dated: August 3, 2009

By: /s/ Elizabeth J. Fossel
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